

Gia Rodriguez

CAUSE NO. DC-19-17257

LATOYA K. PORTER,	§	IN THE DISTRICT COURT
Plaintiff,	§	
v.	§	14TH JUDICIAL DISTRICT
CITY OF DALLAS,	§	
DALLAS POLICE DEPARTMENT,	§	
CHIEF OF POLICE ULİSHA	§	
RENEE HALL, AND MAJOR OF	§	
POLICE MICHAEL IGO,	§	
Defendants.	§	DALLAS COUNTY, TEXAS

DEFENDANT CHIEF OF POLICE ULİSHA RENEE HALL'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant Chief of Police Ulisha Renee Hall (“Chief Hall”) and files this Original Answer to Plaintiff’s Original Petition (the “Petition”) and respectfully shows the Court as follows:

I. GENERAL DENIAL

Pursuant to Rule 92, Texas Rules of Civil Procedure, Chief Hall denies each and every, all and singular, allegations in the Petition, and demands strict proof thereof by a preponderance of the evidence.

II. DEFENSES

Chief Hall pleads the following defenses and reserves the right to plead additional defenses which may become apparent during discovery in this case:

1. Chief Hall asserts that she is entitled to qualified immunity in this action by reason of the fact that she was performing a discretionary function within the course and scope of her

employment and acting in good faith at all times relevant hereto. Chief Hall also claims each and every other immunity to which she is entitled by virtue of her status as an official, employee and/or agent of the City acting within the course and scope of her employment.

2. To the extent that Latoya K. Porter's (Plaintiff) causes of action fall outside the applicable statute of limitations, Chief Hall pleads statute of limitations.

3. Chief Hall pleads that to the extent Plaintiff has failed to exhaust all administrative remedies, she has failed to meet the prerequisites and conditions precedent for filing this civil action.

4. Chief Hall pleads that she is not liable to the extent Plaintiff has failed to mitigate her damages.

5. The same employment decisions concerning Plaintiff would have been made even in the absence of any alleged unlawful motivating factors.

6. All employment decisions concerning Plaintiff were made for legitimate, non-discriminatory, and non-retaliatory reasons.

WHEREFORE, Chief Hall respectfully asks that this Court deny all relief sought by Plaintiff, order that Plaintiff take nothing by this suit, and grant Chief Hall all other relief, general or special, at law or in equity, as to which Chief Hall may be justly entitled.

Respectfully submitted,

Christopher J. Caso
Interim Dallas City Attorney

/s/ Lyudmyla Chuba

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2020, a true and correct copy of the foregoing document was served on John W. Bickel, II, Plaintiff's attorney, via e-service in accordance with the provisions of Rule 21a, Texas Rules of Civil Procedure:

Via e-service: jwbickel@gmail.com

/s/ Lyudmyla Chuba
LYUDMYLA CHUBA